

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

JEROME BLIGE, MARSHELL BERNICE
LEE, and THE ESTATE OF SAUDI ARAI
LEE,

Plaintiffs,

v.

ERNEST FERGUSON, In His Individual
Capacity; JOHN DOE OFFICER In His
Individual Capacity and CITY OF
SAVANNAH,

Defendants.

Civil Action No: 4:24-cv-00131-RSB-CLR

DEFENDANT ERNEST FERGUSON'S
DISCLOSURES PURSUANT TO RULE 26(a)(1)

COMES NOW, Ernest Ferguson, and pursuant to F.R.C.P. Rule 26, provides to the parties
the following:

A. Rule 26 Initial Disclosure

(i) The name and, if known, the address and telephone number of each individual
likely to have discoverable information that the disclosing party may use to support its claims or
defenses, unless solely for impeachment, identifying the subjects of the information.

Ernest Ferguson
2663 Pebble Bow
San Antonio, Texas 78232
(205) 910-7442
chrisfknight5664@gmail.com

Mr. Ferguson has information concerning the June 24, 2022 incident.

MacKenzie Randle
Savannah Police Department ("SPD")
201 Habersham Street
Savannah, GA 31412

Officer Randle has information concerning the June 24, 2022 incident.

Officer Joseph Knight

Savannah Police Department ("SPD")
201 Habersham Street
Savannah, GA 31412

Officer Knight has information concerning the June 24, 2022 incident.

Officer Aaron Mitchell

Savannah Police Department ("SPD")
201 Habersham Street
Savannah, GA 31412

Officer Mitchell has information concerning the June 24, 2022 incident.

Officer William Newman

Savannah Police Department ("SPD")
201 Habersham Street
Savannah, GA 31412

Officer Newman has information concerning the June 24, 2022 incident.

Officer Kyler Giem

Savannah Police Department ("SPD")
201 Habersham Street
Savannah, GA 31412

Officer Giem has information concerning the June 24, 2022 incident.

Officer Emily Krauel

Savannah Police Department ("SPD")
201 Habersham Street
Savannah, GA 31412

Officer Krauel has information concerning the June 24, 2022 incident.

Officer Jolisa Lewis

Savannah Police Department ("SPD")
201 Habersham Street
Savannah, GA 31412

Officer Lewis has information concerning the June 24, 2022 incident.

Officer Christopher Leugillow-Hawkins

Savannah Police Department ("SPD")
201 Habersham Street
Savannah, GA 31412

Officer Leugillow-Hawkins has information concerning the June 24, 2022 incident.

Officer Jessica McGee

Savannah Police Department ("SPD")
201 Habersham Street
Savannah, GA 31412

Officer McGee has information concerning the June 24, 2022 incident.

Officer Sidney Delince

Savannah Police Department ("SPD")
201 Habersham Street
Savannah, GA 31412

Officer Delince has information concerning the June 24, 2022 incident.

Officer Rodney Cooper

Savannah Police Department ("SPD")
201 Habersham Street
Savannah, GA 31412

Officer Cooper has information concerning the June 24, 2022 incident.

Officer Kolby Burwell

Savannah Police Department ("SPD")
201 Habersham Street
Savannah, GA 31412

Officer Burwell has information concerning the June 24, 2022 incident.

Officer Janessa Stalter

Savannah Police Department ("SPD")
201 Habersham Street
Savannah, GA 31412

Officer Stalter has information concerning the June 24, 2022 incident.

Officer Vincent Pellegrini

Savannah Police Department ("SPD")
201 Habersham Street
Savannah, GA 31412

Officer Pellegrini has information concerning the June 24, 2022 incident.

Officer Eric Dukarski

Savannah Police Department (“SPD”)
201 Habersham Street
Savannah, GA 31412

Officer Dukarski has information concerning the June 24, 2022 incident.

Aishia White

Ms. White has information concerning the June 24, 2022 incident.

April Davis

Ms. Davis has information concerning the June 24, 2022 incident.

Samir Patel, Owner of Giant Discount Store, near location of incident

Mr. Patel has information concerning the June 24, 2022 incident.

(ii) A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

See attached and Bates Numbered documents:

SPD Reports

Interview Statement of Ferguson

Interview Statement of Randle

EMS Report of Saudi Lee

Ferguson Administrative Leave Form

Ferguson Alcohol Screen Test

Ferguson’s Garrity Form

Statement of Ferguson

Statement of Randle

Ferguson Body Worn Camera Video Footage

Randle Body Worn Camera Video Footage

(iii) A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including

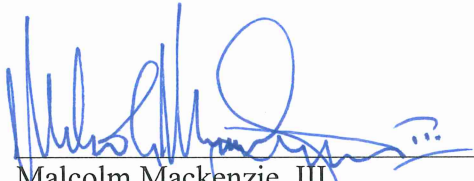
materials bearing on the nature and extent of injuries suffered.

Not applicable.

(iv) (F)or inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

None.

This 5th day of September, 2024.



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CERTIFICATE OF SERVICE

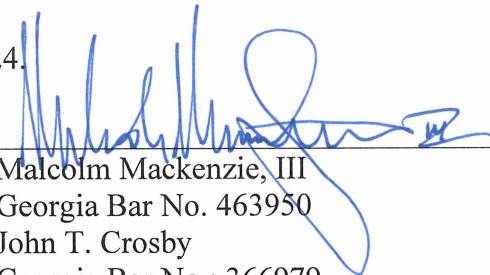
This is to certify that I have served the following parties in this case with a true and correct copy of *Defendant Ernest Ferguson's Initial Disclosures*, via statutory electronic service, and addressed as follows:

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This 6th day of September, 2024.



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